

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA §
§
V. § **CAUSE NO. 4:18-CR-87**
§
LAURA JORDAN, and §
MARK JORDAN §

DEFENDANTS' MOTION TO TRAVEL

Defendants, Mark and Laura Jordan, file this motion to travel to Anguilla and St. Martin from Saturday, August 11, to Saturday, August 18, 2018 to attend the Liberty Bankers' annual rewards trip. The Jordans have attended this same trip on four other occasions, including two times while subject to—and with full knowledge of—the investigation that led to this indictment. Each time, they returned to Dallas as scheduled. Furthermore, this trip was paid for and scheduled prior to the indictment in this case. The Jordans present no risk of flight given their significant ties to the Dallas area, which include six children and substantial ongoing business obligations and opportunities.

For this trip, if the Court permits, the Jordans will depart from DFW Airport on Saturday, August 11, at 6:30 a.m., via American Airlines flight 2567. They will land in St. Martin on the same date, which is a neighboring island to Anguilla. After landing, the Jordans will travel to Anguilla, where they will check-in to the hotel that is hosting the event. They will stay at this hotel for the duration of the

trip. The Jordans will return to Dallas on August 18, departing St. Martin via American Airlines flight 2219 at 7:29 p.m. If this motion is granted, the Jordans will share their full itinerary with Pretrial Services and arrange with their Pretrial Services Officer to retrieve then promptly return their passports.

This is the fourth time that the Jordans have been invited to attend this function. The trip includes a business meeting on Tuesday, August 14. Throughout their travels, the Jordans will be accompanied by several close friends including Brad Phillips, the President and CEO of Liberty Bankers, and his wife, Teri Phillips. Several other friends will be present, given that the Jordans have attended this event for the past four years.

In sum, there will be many eyes on the Jordans and there is no reason to believe they would violate any condition of pretrial release while on the trip. The Jordans are in compliance with all conditions of pretrial release. United States Pretrial Services is unopposed to this request but the Government is opposed. The Jordans respectfully request that this motion be granted.

Respectfully submitted,

THE COGDELL LAW FIRM, PLLC

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CERTIFICATE OF CONFERENCE

I certify that this motion has been discussed with Assistant United States Attorney Chris Eason, and with United States Pretrial Services Officer Tiffany Routh. The prosecutor is opposed and the Pretrial Services Officer is unopposed.

/s/ Dan Cogdell

CERTIFICATE OF SERVICE

I filed this motion via the electronic filing system of the Court, which served all parties.

/s/ Dan Cogdell